

**REMARKS**

This is in response to the Office Action dated November 22, 2005. Claims 1-15 are pending.

**Claim 1**

Claim 1 stands rejected under 35 U.S.C. Section 102(b) as being allegedly anticipated by Ha. This Section 102(b) rejection is respectfully traversed for at least the following reasons.

Claim 1 as amended requires “an insulating layer is provided over the switching device and extends to the transmissive region so as to be provided between the switching device and the reflective plate . . . . a thickness of all insulating material provided between the switching device and the reflective plate is substantially equal to a thickness of the insulating layer provided in the transmissive region.” For example and without limitation, Fig. 3 of the instant application illustrates that a thickness of all insulating material (6) provided between the switching device (24) and the reflective plate (13) is substantially equal to a thickness of the insulating layer (6) provided in the transmissive region (note that it is in the transmission region where reflective plate 13 is not present).

Ha fails to disclose or suggest the aforesaid underlined feature of claim 1. Fig. 7 of Ha, relied on by the Office Action, illustrates that the thickness of the insulating material (170 and 250 combined) provided between the TFT and the reflective plate 181 is *much different* than the thickness of the alleged insulating layer 250 in the transmissive region. Thus, Ha is entirely unrelated to the invention of amended claim 1 and teaches directly away from the same.

**Claim 8**

Claim 8 requires that “a thickness of all insulating material provided between the switching device and the reflective plate is substantially equal to a thickness of the insulating

layer provided in the transmissive region.” Again, Ha fails to disclose or suggest this feature of claim 8. Fig. 7 of Ha, relied on by the Office Action, illustrates that the thickness of the insulating material (170 and 250 combined) provided between the TFT and the reflective plate 181 is *much different* than the thickness of the alleged insulating layer 250 in the transmissive region. Thus, Ha is entirely unrelated to the invention of amended claim 8 and teaches directly away from the same. Citation to Ozawa cannot cure the aforesaid flaws of Ha.

Claim 11

Claim 11 requires that “the transparent electrode is provided closer to the display layer than the color filter so as to cover the color filter, whereas the reflective plate is provided farther away from the display layer than the color filter and the transparent electrode so as to cover the switching device along the profile of an upper surface of the switching device so that the profile of the reflective plate is substantially conformal to the profile of the upper surface of the switching device.” For example and without limitation, Fig. 3 of the instant application illustrates that the profile of the reflective plate (13) is conformal to the profile of the upper surface of the TFT 24.

Ha fails to disclose or suggest the above underlined feature of claim 11. In particular, Fig. 7 of Ha illustrates that reflective plate 181 over the TFT is flat in shape whereas the upper surface of the TFT has a wavy profile due to the significant bumps caused by the S and D electrodes. Thus, Ha fails to disclose or suggest the aforesaid “substantially conformal” feature of amended claim 11.

NIIYA  
Appl. No. 10/779,779  
February 22, 2006

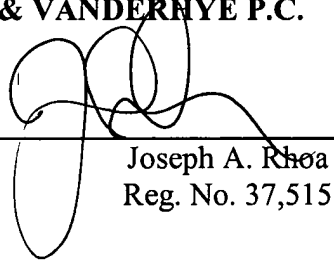
Conclusion

It is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

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By: \_\_\_\_\_



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